

**From:** Mike Wade

**Sent:** Friday, February 20, 2004 2:59 PM

**To:** Dabbs, Paul

**Cc:** Guivetchi, Kamyar; Beutler, Lisa; Alex Hildebrand; Anisa Divine; Bill DuBois; Bill DuBois2; BJ Miller (BJ Miller); Brent Graham; Jim Snow; John Mills; Lloyd Fryer (Lloyd Fryer); Michele Dias; Mike Wade (Mike Wade); Nancy Pitigliano; Steve Shaffer; Todd Manley; Valerie Nera

**Subject:** January 30 Draft Water Plan Comments

Paul:

Attached are comments from the Bulletin 160 Ag Caucus on the January 30 Draft. In addition, we received input from Alex Hildebrand that was too late for full review by the Ag Caucus and still meet the February 20 deadline for comments. Nonetheless, Alex's thoughts need to be considered and are included below for your review.

Thank you.

Mike Wade

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Alex Hildebrand

There was agreement at the last AC meeting that Chapter 1 would not have any hard numbers in it, yet there is still a reference to a \$17 million cost figure.

There has been a lot of discussion about applied water versus water controlled and otherwise lost, ie. The Peter Gleick presentation about saving water by installing low-flow toilets. This strategy works fine on the coast but is already done in the Valley.

Chapter 1, Findings and Recommended Actions - urban areas use about the same amount of water as in the mid-1990's, should say APPLIED water. Also need to point out that much of the urban water is applied and not consumed and reused.

Need to clarify increase in food production per quantity of applied water.

Mike Wade

California Farm Water Coalition

Agricultural Water Management Council

February 20, 2004

Paul Dabbs  
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Dear Paul:

The Bulletin 160 Advisory Committee Agricultural Caucus is pleased to submit these comments on the January 30 Draft of the California Water Plan. These comments are the result of a tremendous amount of work with input from a variety of members that represents the full Ag Caucus. We are hopeful that our comments will result in meaningful changes to the Plan, bringing more balance and neutral tone to the document. While the comments on these pages cover many chapters and sections of the Plan, we expect that additional Ag Caucus comments will be forthcoming as future drafts are produced.

Thank you for the opportunity to submit these comments. If you have any questions, please feel free to contact any member of the Ag Caucus.

### **Introduction and Key Points**

The Water Plan does not yet provide an adequate estimate of the 2030 water supply needed to meet all public needs. Developing an adequate 2030 water supply involves substantial costs and controversial environmental issues. To date, DWR has assumed without proof that the proposed measures in the Implementation Guide will provide sufficient water, even though no credible estimate has been made to determine the amount of developed water supply that will be needed to produce food and fiber for the 2030 population. There also seems to be an assumption that the environment will be protected even if the developed water supply is insufficient to meet 2030 needs.

The Water Plan has been developed without critical data that are necessary to evaluate the state's water supply needs. These data must be collected and analyzed in order to develop sufficient real data to develop reasonable forecasts of future water supply and demand conditions. While we all understand that future water supply development won't necessarily look like historical development, we also understand that there is a very real chance that California's hydrologic future will not be as kind as the past decade. Nevertheless, , under the Plan as now drafted, Californians can expect the following to be part of their future:

- Ecosystem restoration will continue at its current or at an increased level than that which exists today;
- Water supply shortages such as those experienced by South of Delta CVP agricultural contractors who, since 1993, have typically received 60% of their contractual supply (a

reduction of 800 tafy), overdraft of some aquifers, and a reduction by 2015 of up to 800 tafy of Colorado River water in dry years for the Colorado River and South Coast Hydrologic regions;

- Increased environmental and urban demand will be met largely through so-called “soft path” approaches along with water transfers and minor increases in storage in the CalFed target area;
- Implementation of these approaches will cause urban and agricultural water costs to rise, , as increasingly more expensive demand reduction measures are implemented;
- Eventually, urban water conservation costs will exceed local cost-effectiveness and more water will be purchased from what the State Water Plan considers the default supply – agriculture. The domestic supply of food and other agricultural products will then become inadequate. (See the Agricultural Water Use Efficiency section on alfalfa dry-down and regulated deficit irrigation and the Agricultural Land Stewardship and Water Transfer sections on fallowing.)

If the above represents the reality of California’s water supply policy, then the Water Plan ought to state it as such. Considering the risk involved with the above policies, we note that there is no Plan B if the strategy fails, which is a real possibility. There is no credible analysis to justify the assumption that we can continue to produce enough food and fiber for an increase of 600,000 people in California each year while we reallocate water from ag by transfers, urban sprawl, converting farmlands to wetlands, reoperating dams to provide fish flow instead of ag water, and failing to replace the unsustainable overdraft of groundwater which now provides part of the ag water supply.

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Given the above, the Water Plan should substitute the following for the first five Key Findings:

The data necessary to properly complete the Water Plan do not exist or are not evaluated yet.

1. California may be able to meet future needs with existing supplies but to do so will cause water cost increases and further decrease of the state’s agricultural water supply. This will impact the state’s ability to provide sufficient food and fiber for the 2030 population.

Developed Water Use – Sample Table

	Current (35 million)	Increase for 2030 (52 million)	Percent 2030	Future Best (52 million)
Ag Transfers	1 MAFy	2.4 to 4.0 MAFy	9% – 14%	30.0 MAFy
Surface & Subsurface Storage / Conveyance	??	2.5 to 3.5		3.5 MAFy
Enviro	??	+ 1 MAFy		1.0 MAFy
Urban	9 MAFy	> + 4.5 MAFy		13.5 MAFy
<b>TOTAL</b>				

2. The State’s best estimate, based on current supplies and future needs, is that water costs will climb by XX%.

	Current Developed (\$/AF)	Future Needs (\$/AF)	% Increase
Ag			
Enviro			
Urban			

3. The conservation necessary to meet future water supply needs with the existing state supply will cost **\$75 billion from 2005 to 2030**.
4. The higher cost due to increased water conservation will cost the typical California family **of four (??) = \$69/AF/yr x 4 = \$276** per year for urban needs (including ecosystem restoration) and for food.

Based on: \$75 billion over 25 years = \$3 billion per year  
Average population 2005 to 2030 = (35 + 52)/2 = 43.5 million  
Average cost/person/year = \$3 billion per year / 43.5 million = **\$69 / year**  
= **\$5.75 per person per month** -- to meet DWR's soft path estimate

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The following topics also need to be included in the Plan.

Surface water storage projects other than those identified in the CalFed Record of Decision. The Plan should provide California's policy-makers and citizens with all of the available information so they can make informed decisions. Cost or political hurdles should not be a consideration for the California Water Plan -- those issues are to be addressed in the public arena by the people with whom the ultimate decisions lie.

Serious discussion on the subject of environmental water use efficiency. All stakeholders need to be accountable for their water supplies. That is, environmental water use should be held to the same efficiency standards as that apply to urban and agricultural water users.

Third, DWR needs to answer the question of what will happen if the state's basic hydrology fails to mimic the generous patterns that have been enjoyed for the past decade. If soft path approaches fail to meet the state's needs, what will be the impact on water costs, agricultural water supplies and California's position as the provider of 50 percent of the nation's fruits, nuts and vegetables?

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Chapter 6 of the January 30, 2004, Draft of the Water Plan includes a section on Principles for Assistance. The entirety of this section -- Chapter 6 - Section IV. b. Principles for Effective Regional Integrated Resource Planning and Providing State Assistance -- should be deleted. The Water Code sections relevant to the Water Plan do not suggest DWR should set policy for allocation of State funds. This appears to exceed the authority of DWR vis-à-vis the Water Plan, and does not further the Water Plan's mandated purpose -- to identify and plan for the future water needs of California.

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The Ag Caucus is very concerned that our past comments have not made it into the Plan, even though the comments have been submitted several times both at AC meetings and in writing.

- The Water Plan still is technically wrong about the purpose of regulated deficit irrigation – it is a deliberate practice to increase crop yield and/or quality by failing to meet the crop’s water requirement; its purpose is not a reduction in evapotranspiration
- Alfalfa dry-down programs are still characterized as water use efficiency.

If comments submitted by the ag caucus or a member of the Advisory Committee are not going to be considered, we need for DWR to explainwhy the comments were not considered, and how the decision was made.

## Detailed Comments

### Chapter 1 – Findings and Recommended Actions

1. California is shaped by its richly diverse people, environments, businesses, land uses, climates, and also by its variable hydrology. Sustainable water management in California requires full consideration of the diverse uses of water and the variable nature of its temporal and geographic distribution. With its current population and water use patterns, California has **insufficient** water resources to meet **all water** management objectives in most years. Water management challenges persist on local and regional scales and are pronounced in years of extreme hydrology.

(**Bold** text indicates added language to existing January 30 Draft.)

a. Urban areas use about the same amount of water today as they did in the mid-1990’s, accommodating a population growth of over 3.5 million through **a number of activities, including** increased water use efficiency and recycling, **infrastructure improvements and construction of additional storage facilities.**

b. **Even** in average water years **some agricultural water users do not receive their full water allocations.** Improvements in agricultural productivity and **water use** efficiency over the past 25 years have increased crop production per acre-foot of water by 50 percent.

c. More water has been dedicated for restoring impacted ecosystems. **In average water years most** environmental **requirements and** needs are met.

d. California continues to rely on an unsustainable overdraft of some of its groundwater basins which further reduces available water supply and, in some areas, degrades groundwater quality.

e. In many areas, surface and groundwaters are impaired by natural and human-made contaminants, **limiting water uses**, degrading environmental resources, threatening human health, and increasing water treatment costs.

- Key Finding 1.b. suggests most agricultural water demands are met in average years, but there is no acknowledgement that this is at the expense of groundwater overdraft, which is mentioned in 1.d.
- Key Finding 2 repeats many of the points from Key Finding 1.
- Key Finding 3 does not consider the amount of water that will be needed to provide food and fiber for the 2030 population. The ag caucus has previously suggested that data from the AIC study on current food production be extrapolated to 2030. Without this information, we cannot be sure that 3.5 - 6 million acre-feet is sufficient to meet 2030 water needs.
- Key Finding 4 reads more like a recommendation and should be relocated to that section.

Key Finding 5. Throughout California stakeholders are beginning to work together in their regions and watersheds to develop programs that include multiple jurisdictions and provide multiple resource benefits. Regionally-based planning efforts are integrating a broader range of water management activities than historically thought to be available.

- Additional Finding 5 should not mention the “thousands of Native Americans [that] do not have water piped to their homes.” Unless the Water Plan proposes to do something about this, it makes little sense to mention it. There are likewise “thousands” of farmers whose operations are impacted by urban sprawl (i.e., inability to apply pesticides or herbicides) and “thousands” of homes in major cities that have crumbling water pipes. As the state’s Master Plan, the Water Plan need not discuss issues at this level of detail.

3. California is the top agricultural producer in the nation. The State contributes over half of the nation’s fruit, nut, and vegetable production. Providing food and fiber crop products to Californians, as well as to other states and countries, consumes more water than is consumed by all other household needs. In some areas agricultural water supplies have been reduced by water transfers to urban areas or to environmental restoration projects and from increased groundwater overdraft. **Many of California’s counties are dependent upon agriculture as the primary economic contributor.**

6. As a result of global climate change California hydrology will not be the same as we have experienced in the past century. While many uncertainties remain, primarily on the degree and timing of change to be expected, it is likely there will be significant reductions to the Sierra snowpack. This has major implications for water supply, **infrastructure needs**, flood management and ecosystem health.

- Key Recommended Actions 5 – 7 should be deleted. These are too obvious to mention, or are within DWR’s administrative authority to implement.
- Additional Recommended Actions 1, 2, 5 should be deleted. The need for Action 1 is questionable at this time, and runs the risk of becoming a political body whose recommendations can run counter to the purpose of the Water Plan. Action 2 and 5 are too obvious, and offer nothing to achieving the purpose of the Water Plan, which is to “plan for the orderly and coordinated control, protection, conservation, development, and utilization of the water resources of the state.” (Water Code Section 10004)

#### Chapter 1 – Plan Overview

- Water Code Section 10005 calls the Water Plan a “master plan which guides the orderly and coordinated control, protection, conservation, development, management and efficient utilization of the water resources of the state.” References in the document to “strategic plan” should be changed to “master plan” in order to maintain consistency with the Water Code.
- The fourth goal for 2030 – “environmental justice for all Californians” is extremely broad for the Water Plan. It can be deleted, and at a minimum should be edited to reflect environmental justice for aspects covered in the Water Plan.
- The fifth goal for 2030 – “Stronger state leadership” seems to have conflicting wording. It reads, “[The state needs] more public investment to ... develop the state’s water resources as a public trust asset.” It is disagreeable to suggest that any future water development will be only for public trust assets. The public trust doctrine admits that, as a practical matter, the state will grant appropriation rights for uses outside the stream, even when this may harm the trust uses of the source stream. This goal must be rewritten to reflect the true purpose of water resources development in the context of the Water Plan, which is to “guide the orderly and coordinated control, protection, conservation, development, management and efficient utilization of the water resources of the state.” (Water Code Section 10005)
- The sixth goal for 2030 – “Regions play the central role in their integrated water and resource planning” conditions state assistance on “recommended incentives and principles.” These principles are covered more fully in Chapter 6. Members of the ag caucus have provided comments on this numerous times both in writing and at AC meetings. We feel it is inappropriate for the Water Plan to recommend a policy for dispensing grant and loan funding. Nowhere in the Water Code is there mention that the Water Plan should be a vehicle for allocating finances. Likewise, it is hard to imagine that DWR would condition its technical support on the principles mentioned in Chapter 6. If DWR insists on including the recommended incentives and principles, the ag caucus demands to have an explanation on why DWR feels they must be included, and what DWR views as its authority for including them.
- Paragraph 2 on page 11 strongly suggests that management objectives such as water quality, flood management, drought resiliency, ecosystems and other objects “must all be considered

when developing sustainable plans.” DWR has prejudged the definition of “sustainable” in this paragraph. In fact, the various regions of the state will all have plans that reflect the water management objectives of their regions, and these may or may not include all of the objectives DWR mentions in this paragraph. DWR should rewrite this paragraph as follows: “While water supply needs are often the most easily quantifiable objectives, other important objectives are often integrated into regional plans, such as water quality, flood management, drought resiliency, and ecosystems.”

- Page 12-13 – “Principles for Providing State Assistance” should be deleted. More discussion on this is provided under comments for Chapter 6.
- Page 15 – In Phase 3, CDFA is to forecast the amount of water needed to feed population in 2030, and not to estimate future irrigated crop water use.
- Page 16 – Rather than referring to the AC as a “consensus seeking process” it would be more accurate to call it a “collaborative process.”

## **Chapter 2 – California Water Today**

- The last two paragraphs on page 1 leads the reader to believe that Native Americans lived the good life until local agencies came along and developed water supplies. References to “thousands of years” and “high species diversity and biological productivity” send the unmistakable impression that those pesky water agencies and urban development ruined the lives of Native Americans. The fact is that every single member of the ag caucus was born here and are native to this country.
- The first full paragraph on page 2 takes another dig at development, blaming it for degrading the natural environment and other specific ills. California’s population increases are driven mostly by immigration into the state. Water districts didn’t ask for people to move to California. This entire chapter takes great care to blame ecosystem woes on water and urban development. This is yet another example of how poor writing is injecting non-neutral language into the Water Plan.
- Section 2.2 “Existing statewide water uses and supplies” expresses a similar thought that flows on many streams have been so modified by development that they “no longer support ecosystem functions.” This assertion appears to be an opinion that serves little purpose in the Water Plan. The continual “people bashing” that is scattered throughout the document is starting to anger the ag caucus. We have continually stressed the need to clean up such poor writing, but have yet to see significant progress.
- The statewide water balance table needs more transparency. The formula for groundwater change in storage is:

GW change in storage = intentional recharge + deep percolation of applied water + conveyance deep percolation – withdrawals.

The table provides no numbers for intentional recharge, deep percolation of applied water or conveyance deep percolation. These items should be added to the table so that the reader can track derivation of change in storage.

- Page 19 should add a question for California water agencies as follows. (5) what role should the state play in enhancing reliability of existing water projects?
- Page 22 – “Degradation of the ecosystem”. The ag caucus is extremely tired of the blame-game being played out in this Water Plan. Once again development is blamed for ecosystem degradation. No mention is made of the fact that, without some of the developed water supplies, ecosystems would crash in dry years and seasons. The fact is that the SWP contractors get little water from Lake Oroville. Most of its 3.5 million acre-feet of storage is used for ecosystem needs. The SWP contractors are required to pay for the capital, operation and maintenance costs of this facility. In dry years a greater proportion of Oroville stored water supports ecosystem needs than is delivered to contractors.

### **Chapter 3**

(**Bold** text to indicate where language is added to January 30 Draft)

- 1) Under Planning for an Uncertain Future, Page 2, first paragraph, the next to the last sentence should read “in order to overcome this difficulty, as well as existing gaps in our data and analytical tools, DWR and the Water Plan Public Advisory committee developed three plausible future scenarios **which must comply with the laws regarding the purpose of the Water Plan, but which** vary the range of key factors that **lead to different predictions of** amounts of water needed for urban, agricultural, and environmental uses for each of the scenarios like population, **the agricultural water needed to assure an adequate future supply of essential agricultural products,** and environmental water.”
- 2) Under Frequency and Intensity of Flood Events, it should be noted that capturing these flows in excess of Delta outflow requirements constitutes a very large potential for increasing the developed water supply. Measures to reduce flood flows usually also increase water supply
- 3) Under the heading of Global Climate Change, it should be clearly stated that although the Water Plan calls attention to this potential problem it does not propose measures to offset the effect on water supply that would result from reduced water storage in the Sierra snow pack.
- 4) Comments on 3.6 Future Scenarios and Responses
  - a) Page 5. The AC is not in agreement that Irrigated Land Area or Crop Acreage is a “key driver” for needed agricultural production. The key driver is providing the essential agricultural products needed by the 2030 population. There is plenty of land in California even though agriculture may be driven to use poorer land. The key driver in producing food is adequate water. The

important consideration also is not Crop Unit water Use per acre, it is the production of essential agricultural product per acre foot of water consumed by the crop or otherwise lost to reuse.

- b) Page 7 under the heading “Agriculture”. The “current trend” is that there are about 600,000 more people to feed and clothe every year, and they must be provided with adequate farm products per AB 2587. We propose to provide housing for 600,000 more people each year, but they must also have food.

- c) Page 11. Agriculture

There is no credible basis for the assertion that crop acreage will not increase over the 2000 level, or for the claim that we can feed 50% more people with no increase in agricultural water supply. The discussion does not even address the fact that the 2000 agricultural water supply has been and is being reduced by water transfers from agriculture, by urban sprawl taking the water that is appurtenant to the land it preempts, by conversion of farm land to wetlands, by reductions in the sustainable use of groundwater, etc.

## **Chapter 5 – State Role and Responsibilities**

- Overall, the bullets on the state’s continuing role add very little to the Water Plan. Section 10004 of the Water Code specifies that the Water Plan is to “plan for the orderly and coordinated control, protection, conservation, development, and utilization of the water resources of the state.” Section 10004.5 further states, “the department shall include in the plan a discussion of various strategies, including, but not limited to, those relating to the development of new water storage facilities, water conservation, water recycling, desalination, conjunctive use, and water transfers that may be pursued in order to meet the future water needs of the state. The department shall also include a discussion of the potential for alternative water pricing policies to change current and projected uses. The department shall include in the plan a discussion of the potential advantages and disadvantages of each strategy and an identification of all federal and state permits, approvals, or entitlements that are anticipated to be required in order to implement the various components of the strategy.” Section 10004.6 further states, “As part of updating The California Water Plan every five years ..., the department shall conduct a study to determine the amount of water needed to meet the state’s future needs and to recommend programs, policies, and facilities to meet those needs.” Hence the bullets listed generally fail to meet the Water Code requirements. The same is true of the recommended actions for strengthening the state role. This section must be completely rewritten with the Water Code’s requirements in mind.

Also, several of the bullets listed are unnecessarily broad, such as the first bullet on page 2 and the fourth bullet on page 3.

## **Chapter 6 – Principles for Effective Regional Integrated Resource Planning and Providing State Assistance**

- This entire section is inappropriate for the Water Plan. The Water Code as it relates to the Water Plan does not mention a need for the state to develop a plan for allocating financial resources. While the state develops criteria for competitively scoring proposals, this section seems to suggest that all state agencies would embrace the criteria in this section. In the context of the Water Plan's purpose as codified, consider the following train of logic.

Purpose: The Water Plan shall plan for the orderly and coordinated control, protection, conservation, development, and utilization of the water resources of the state.

How to implement: DWR will develop rules for allocating financial resources.

- The above logic simply doesn't go together. Yet DWR insists on following this illogical course. The ag caucus demands that DWR explain to us (1) what is broken with the current method for developing criteria for competitively scoring proposals that Chapter 6 aims to fix; (2) why DWR feels they must be included; and (3) what DWR views as its authority for including them. The answers to these questions are not apparent to the ag caucus.

#### Agricultural Water Use Efficiency

- The second paragraph on page 1 should specify 33.7 million acre-feet of applied water.
- DWR still mischaracterizes the purpose of regulated deficit irrigation. It does not reduce transpiration. Rather, it reduces the amount of transpiration the farmer chooses to satisfy with irrigation water. This has been explained in writing and at AC meetings numerous times, yet this error continues to appear in the Water Plan.
- The numbers on WUE net water savings and costs attributed to the CBDA are not in the Record of Decision. Rather, they appear in the WUE Program Plan in the EIR/S. This reference needs to be changed. Also, it would be helpful if the numbers were double-checked with CBDA WUE Program staff.

#### Page 2 Paragraph 2

- Make clear that pressurized irrigation increases energy costs, sending a price signal to the water user. Also, last sentence, add comment that additional WUE actions would take place if they were either locally cost effective or if not, outside sources of funding were available.

#### Page 3 Add letter c.

- RDI can reduce demand but reduced water use is a secondary benefit from the grower perspective. RDI is a production management decision, not a water savings decision.

#### Page 3 Last paragraph – “**Environmental** benefits may...”

- Make clear that “increased concentrations in of pollutants in drain water” is a detriment to TMDLs, which are based on concentration of material in the water.

- On page 4, the major issues facing additional agricultural water use efficiency need not be listed, since the following pages explain in detail the issues. This list actually seems rather silly.
- On page 6 under “Implementation” the first paragraph should be deleted since it is superfluous. The second and third paragraphs are extremely negative and must be rewritten to remove the negativity or dropped.
  - Update AWMC signatory numbers to 60 and 3.8 million acres.

Move text on Hardware upgrades, Water Management, and Reducing ET to appropriate sections on pages 1-3.

- On page 7 under “Measurement, planning and evaluation” the first paragraph should be deleted since it mischaracterizes the need for measurement. A great many efficiency measures are evaluated and implemented on lands where water supplies are not directly measured. As an example, a farmer’s decision to replace an irrigation system may not be justified purely from a water use perspective.
- On page 7 the last paragraph should be deleted. The ag caucus does not agree that the AC identified lack of water use data collection and analysis, and lack of water use measurements as being “a major concern.” There seems to be an underlying assumption here that farmers are stupid and need to know more about their water use in order to maximize their profits, when in fact higher measurement may not affect pricing signals at all. (For example, a groundwater pumper gets price signals from well capitalization and power costs; there is a direct link between costs and water usage that is not strengthened by installation of a meter.)
- On page 8, Paragraph 1, UC Extension offices often collect this type of information. As do irrigation districts, I again suspect that the issue is that until this SWP there was no reason for DWR to access it. Nor, to my knowledge has it been requested from IID for this Plan.

The second paragraph, controlled dry-down of alfalfa should be deleted. It is more appropriately discussed in the Water Transfers section.

#### Paragraph 2

In 1991, IID carried out a Crop Specific Modified Irrigation Program Pilot Program to evaluate removal of irrigation water from alfalfa during the period August 1 - October 15, 1991. The results were not promising, and the program was not pursued. Other agencies and research institutions have undoubtedly carried out similar research. These need to be accessed by DWR before such a statement is made in the SWP.

#### Point 4

Economic incentives work even when they are not simple and understandable. Neither farmers nor irrigation district staff is stupid. This may be left over from someone’s experience with innovation in an urban setting.

## Point 5

This text confuses innovation with motivation. What is written here, “By establishing an atmosphere where...:” is motivation. Innovation has to do with technological advancement made available to districts and farmers by scientists, engineers, and industry consultants and manufacturers.

- Section 4 “Education and motivation” should be deleted since it adds little to this section.
- Section 5 “Innovation” should be deleted since it adds little to this section, and actually suggests that a hostile atmosphere exists that prevents pursuit of new WUE methods. The ag caucus is unaware of any empirical or observational data that justifies this statement.
- Section 6 “Dry-year considerations” should delete reference to an alfalfa summer dry down program since this is more appropriately discussed under the Water Transfers section.
- The Recommendations section contains way too many recommendations that add little to the discussion on WUE. They can be safely condensed down to the major headings (i.e., “Fund agricultural water use efficiency projects”).

## **Ecosystem Restoration**

- Page 1, second paragraph. Modify second sentence to read, “Instead, as used in this Water Plan, ecosystem restoration focuses on the rehabilitation of aquatic ecosystems so that they supply important elements of their original structure and function in a sustainable manner.”
- Page 1, second paragraph. Modify the following sentence, “Ecosystem restoration is included among the water management strategies in *Water Plan Update 2003* because it is linked with improving water supply, and also because it is an important consideration for water managers as they pursue integrated resource management.”

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It is debatable whether ecosystem restoration is a “proven strategy” to improve water reliability. In some cases, ecosystem restoration is going to reduce water supplies (i.e., Trinity River ROD). As well, quite a large chunk of funds spent by CALFED so far on ecosystem restoration will have absolutely no impact on water reliability. The San Joaquin Brush Rabbit comes quickly to mind, since the ag caucus is unaware of any brush rabbits being sucked into the export pumps. Also, the link between ecosystem restoration and integrated planning is not self-evident to me. It is not universally applicable in the planning process and thus should not be presented as such.

- Page 1, third paragraph. The desire to improve the conditions of ecosystems was only one facet of the recent water bonds. Propositions 204, 13 and 50 do not mention ecosystems in their titles, which strongly suggest that voters passed these bond issues for reasons other than the ecosystem. The ag caucus feels this paragraph trivializes and mischaracterizes the overarching reasons for passage of the bonds by voters.

- Page 1, fourth paragraph. This paragraph should make it clear that the transformation in integrated resource management applies primarily to the Bay-Delta and its watersheds. The CALFED Program only seeks to reduce the conflicts in this system. Unfortunately, there is also a significant resistance from some environmental stakeholders to implementation of the water supply reliability components of CALFED. The Delta Improvement Program is a good example.
- Page 2, top of page. The paragraph suggests that water managers are primarily responsible for ecosystem restoration strategies and for providing adequate flows for ecosystems. If “water managers” means state and federal water project operators, the text is adequate. If “water manager” means water district management staff, there’s a problem. The ag caucus denies that Tulare Lake WSD, Imperial ID, Kern County Water Agency, and other water entities are responsible for providing appropriate water supplies for ecosystems. “Water managers” is used in several locations in the document to mean the state. These should be clarified.
- Page 3, third paragraph. This paragraph is extremely apologetic toward historical water development. Also, the ag caucus doesn’t think the Water Plan should suggest that “consensus” is the model for implementing water management programs, especially since the Water Plan process is not a consensus process. It is also worth noting that historical water developments did have sufficient consensus to authorize their construction and operation.
- Page 3, fourth paragraph. This paragraph suggests that all future water projects must integrate ecosystem restoration in order to be successful. The Bay-Delta Program integrates ecosystem restoration in a wide-ranging program, including levee maintenance, flood control, water use efficiency, water development, water transfers. Therefore programs that are integrated with the Bay-Delta Program do not need additional ecosystem restoration in order to succeed.
- Page 5, “Efficiency of restoration actions.” The last sentence of this paragraph mischaracterizes opposition to restoration. There is not significant opposition to commitments of money for the Bay-Delta ecosystem restoration program. There is significant opposition to provision of more water for ecosystem restoration without there being biological justification. The ag caucus feels that the primary reason for ecosystem efficiency is to compare flow vs. non flow measures and implement those non flow alternatives that achieve the highest resource efficiency.
- Page 5, “Single-purpose planning.” This paragraph adds nothing to the discussion on ecosystem restoration and should be deleted.
- Page 6, “Effectiveness and efficiency of restoration actions.” Drop the last portion of the sentence, “and get the most out of water, funds and time spent on restoration of impacted ecosystems.”
- Page 7, “Funding uncertainty.” This section is unnecessary. It falls under “Recommendations for ecosystem restoration.” The CBDA user fee would provide \$35

million annually for the ERP, but is to be based on the CALFED beneficiary-pays principle. The ecosystem restoration program would clearly be the beneficiary, so why should water users be saddled with this fee? This section suggests DWR is taking a position on implementation of the user fee. If it is not, then this recommendation is meaningless.

### **Colorado River Agreement**

Page 4 “In addition to meeting CBDA goals, California must also reduce the use of Colorado River water...”

- Indicate that this is a reduction of 800 taf per year by 2018 – or whatever the magic date is
- Rewrite this to indicate that the agreement has been reached, and be explicit that Ag WUEs on the part of IID, which start in 2008, by 2026 will result in 303 taf per year of water for transfer to the South Coast Region, MDWSC agency.
- IID’s system WUEs for this program will include seepage recovery, lateral interceptors, mid-lateral reservoirs and a small amount of canal lining
- IID farmers are free to undertake whatever WUEs they choose. These are expected to include tailwater recovery systems; drip, sprinkler and other technological water application improvements; improved irrigation scheduling and water management
- Do not include “reduction of dependence on long-term groundwater overdraft” in the paragraph on the Colorado River Agreement. It is a totally separate issue.

### **Follow through with this Colorado River Agreement in the sections on Funding; Implementation; and Recommendations**

Summary:

Note 1: Fallowing will be the sole activity from 2003 through 2007, and will result in 150 taf per year by 2013 & will last through 2017. Of this, 1/3 will go to the Salton Sea and 2/3 will go to the San Diego County Water Authority (see Note 3, below). As the SWP is currently configured, fallowing on the part of IID in fulfillment of Co River Agreement belongs in the Ag Lands Stewardship strategy.

Note 2: All American Canal and Coachella Canal lining will result in 103.25 taf per year. Per SWP configuration, , this should be part of the Conveyance strategy.

Note 3: Salton Sea Impacts. From 2003 through 2013, IID will send to the Sea one AF of water for every 2 AF that go to San Diego. Thus, in 2005, of the 15 taf obtained from mitigation fallowing, 5 taf will flow to the Salton Sea and 10 taf will be transferred to the SDCWA in the South Coast Region. Note mitigation is not a part of the Ecosystem Restoration strategy, as written. As yet, I have not determined into which strategy mitigation fits. This point was registered as an action item during the Ecosystem Restoration teleconference on Feb 11, 2004.

USE DWR’s website, and include this information

### **COLORADO RIVER AGREEMENT**

**DWR Offers Colorado River and Salton Sea Information Online**

2/10/04 - DWR announces the new web site for State implementation of the 2003 Colorado River Quantification Settlement Agreement and Salton Sea ecosystem restoration legislation. See: <http://www.salttonsea.water.ca.gov/index.cfm> #

## **Conveyance**

Page 3 – system operational flexibility

- I don't know about other systems, but where I work reservoirs are required in addition to conveyance to improve system operational flexibility. Please address this – one way or the other, or indicate that in some situation such as the AAC and Imperial Irrigation District, this will be required.

Page 3, last bullet – “Given California's “flashy” natural drainage characteristic, ... “

- Does this have something to do with the movies or Grammy's? Use an English word or phrase here that conveys what the author means. I imagine that will be something like, “Given that natural drainage in California can take the form of flash flood events” – or whatever the author is thinking about here.
- 

*Page 4 Potential costs of water conveyance*

- Include lining AAC and Coachella Canals – state funding of \$235 million.

For information on this, see [http://www.dla.water.ca.gov/sd/environment/canal\\_linings.html](http://www.dla.water.ca.gov/sd/environment/canal_linings.html)  
Which reads in part:

### **“Role of Canal Lining in Implementation [sic] of California's Colorado River Water Use Plan**

A core component of California's Colorado River Water Use Plan is the lining of these canal sections and the subsequent transfer of conserved water to the Metropolitan Water District of Southern California. This transfer will be made according to terms and conditions of a series of agreements entered into by contracting California water agencies (the Quantification Settlement Agreement). Water conserved through lining of the canals will be made available to Metropolitan Water District and the San Luis Rey Settlement parties.

### **State Funding to Assist in Implementation of the Plan**

[California Water Code Sections 12560 et seq.](#) “

**Follow through on this item in the Major issues and Recommendations sections of this strategy.**

- Additional rationale for including All American Canal (AAC) & Coachella Canal lining under this strategy:

Text in this strategy on Page 6 states,

#### **“Within a region:**

1. Line conveyance canals to reduce seepage...”

- Include items for increasing flexibility & other benefits cited on Page 3.

Page 6

**Between regions.**

- Add bullet 2. Per state law, provide finances for lining of AAC & Coachella Canals – to make available 102.35 taf annually to South Coast Region MDWSC agency.